



Because these requirements “‘are not of a type that we have traditionally considered as a punishment,’ . . . a registry kept by the state and disclosed publicly is constitutionally sound.” Slip Op. at 12 (quoting *Doe v. Bredesen*, 507 F.3d 998, 1005 (6th Cir. 2007)).

Third, the Sixth Circuit held that “Director Rausch cannot be enjoined from enforcing provisions of the Act which he does not enforce.” Slip Op. at 15. The Court held Director Rausch’s responsibilities to “design[] and issu[e] forms, . . . creat[e] and maintain[] the registry database, . . . disseminat[e] information to prosecutors and law enforcement, . . . and manag[e] the repository of original registry forms . . . fall squarely within the legitimate regulatory scheme which Tennessee is constitutionally allowed to provide and maintain.” Slip Op. at 14-15.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been filed and served via the Court's electronic filing system to the individual listed below this 22nd day of May, 2024.

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